# Exhibit 4

From: Monterio, Charles

**Sent:** Friday, April 12, 2013 6:30 PM **To:** Margaret P. Kammerud; zz-IPEngine

Cc: QE-IP Engine; 'Noona, Stephen E.'; 'W. Ryan Snow (wrsnow@cwm-law.com)'; 'Donald C.

Schultz (dschultz@cwm-law.com)'

Subject: RE: I/P Engine v. Google -- Proposed Schedule for Post-Judgment Damages

#### Meg,

It seems that there is a disconnect in what we discussed during our call earlier this week. We never agreed that extending the briefing schedule concerning I/P Engine's ongoing royalties motion was appropriate. During the meet and confer, we agreed to consider a subsequent proposal from Defendants to address the alleged issues that Defendants believe exist based on Google's future implementation of an allegedly, non-infringing AdWords system. While I/P Engine does not understand fully why Defendants believe this future AdWords system impacts the ongoing royalties briefing other than potentially establishing a sunset date, we were willing to consider your proposal and explanation for it.

Based on your email below, it is unclear as to what type of extension and discovery relating to both the current briefing schedule and discovery relating to Google's claimed design around you are proposing.

Please clarify so that we can consider and respond.

### Charles

(202) 420-5167

From: Margaret P. Kammerud [mailto:margaretkammerud@quinnemanuel.com]

**Sent:** Friday, April 12, 2013 4:56 PM **To:** Monterio, Charles; zz-IPEngine

Cc: QE-IP Engine; 'Noona, Stephen E.'; 'W. Ryan Snow (wrsnow@cwm-law.com)'; 'Donald C. Schultz (dschultz@cwm-

law.com)'

Subject: I/P Engine v. Google -- Proposed Schedule for Post-Judgment Damages

#### Charles,

As discussed on our call this week, the parties are in agreement that some extension to the present briefing schedule concerning Plaintiff's motion for post-judgment damages is appropriate.

In order to allow Plaintiff ample time for discovery concerning the launch of a change in the operation of AdWords and to allow Defendants ample discovery concerning Plaintiff's post-judgment damage theories, we propose the following schedule. Bartholomew Furrow will be traveling outside the country in May and early June, so at this point, June 7 is the earliest deposition date we can offer for him

Please let us know if you are amenable to this schedule, and we will prepare a motion seeking this extension.

In interim, while you are considering this proposal, can you confirm that Plaintiff will agree to an additional two weeks for the Defendants' opposition brief? We will obviously reciprocate with your reply.

Best, Meg

## **Proposed Schedule:**

- · May 17 Source code available for review
- On or before June 7 Provide Bartholomew Furrow for deposition
- · June 21 Plaintiff to serve any additional expert declaration or revised motion.
- July 2 Dr. Becker (or any other expert on whom Plaintiff may rely) will be made available for deposition by this date.
- · Defendants will have two weeks from final expert(s) deposition to file opposition.
- · Plaintiff will have two weeks from filing of opposition to file reply.

Margaret P. Kammerud

Associate,

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